

Bob Joondeph, Chair  
Nancy J. Altman  
Jagadeesh Gokhale  
Kim Hildred



400 Virginia Ave, SW  
Suite 625  
Washington, DC 20024  
(202) 899-1026  
[www.ssab.gov](http://www.ssab.gov)  
[@ssabgov](https://twitter.com/ssabgov)

Claire Green, Staff Director

July 6, 2021

Shalanda Young  
Acting Director  
Office of Management and Budget

Dear Acting Director Young:

The Social Security Advisory Board (“Board” or SSAB)—a bipartisan, independent Federal agency that advises the President, Congress, and Commissioner of Social Security—offers the following public comment in response to the Office of Management and Budget’s (OMB) request in the Federal Register on “Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government.”<sup>1</sup> This statement summarizes relevant past work authored or facilitated by the Board for OMB to consider as it supports agencies, particularly the Social Security Administration (SSA), in assessing equity in their programs. In particular, the work summarized below offers considerations most closely aligned with three of the five areas defined in the request: (1) Equity Assessments and Strategies; (2) Barrier and Burden Reduction; and (5) Stakeholder and Community Engagement. The Board notes that some of the following information was presented to the Board by outside individuals or organizations and does not necessarily reflect the views of the Board or any Board member.

An ongoing Board portfolio examines Social Security’s service to the public. As outlined in the series preface published in June 2020, it is essential for SSA to use evidence-based measures to evaluate various population groups’ access to services in-person, by phone, and online.<sup>2</sup> The first paper in the series, released concurrently with the preface, examines SSA’s decision-making process for closing field offices.<sup>3</sup> The Board finds that SSA failed to (1) publicly share an evaluation of how its decisions to close field offices might affect different populations; (2) involve the public in its decision making; and (3) make formal efforts to minimize the effect on impacted communities, despite

---

<sup>1</sup> OMB, “[Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government](#),” 86 Fed. Reg. 24029 (May 5, 2021), OMB-2021-0005.

<sup>2</sup> SSAB, “[Examining Social Security’s Service to the Public: Preface to a Series](#),” June 2020.

<sup>3</sup> SSAB, “[Decisions Regarding Field Office Closures](#),” June 2020.

academic research suggesting field office closures have pervasive effects and differential impacts by socioeconomic status and other measures. Without data or stakeholder input about how agency decisions affect different populations, SSA cannot rigorously assess the equity of its programs.

In May 2021, the Board continued its work in this portfolio by hosting a roundtable.<sup>4</sup> In one panel, different experts contributed views on how SSA could study barriers in accessing Social Security's programs. Advocates and researchers discussed challenges faced by underserved populations and relevant research questions. OMB officials spoke about how Federal Performance Framework guidance supports agency efforts to measure customer experience and assess evidence to inform more equitable administration of agency programs.

Assessing whether Social Security's services are equitably administered to underserved populations is difficult because SSA does not publish program data by race and ethnicity, though it did so in the past. When the Board met with SSA's Office of Retirement and Disability Policy, one Board member raised the issue. SSA expressed support, but such data production appears to require interagency cooperation with the Census Bureau. OMB is properly positioned to make data production and release possible.

The Board continues to encourage SSA to collect disaggregated evidence, including customer experience measures, to inform its policy decisions. These analyses could help SSA answer a central question facing the agency: how should it determine the optimal mix of in-person, online, and phone services without compromising access to SSA services by different populations?

The Board's other portfolios on disability and representative payees highlight areas where additional data and stakeholder engagement would inform policy improvements to minimize burdens on the public.<sup>5</sup> In response to a Congressional request, between March 2019 and May 2020, the Board hosted a series of roundtables during which outside experts discussed improvements to SSA's initial disability determination process. The Board released a staff-authored summary of the ideas raised by participants during each roundtable.

---

<sup>4</sup> SSAB, "[Roundtable: Social Security's Public Service](#)," May 2021.

<sup>5</sup> SSAB, "[Summary of Disability Process Improvement Roundtables](#)," October 2020; SSAB, "[Recent Developments in SSA's Payee Program](#)," June 2019; SSAB, "[Re: Notice and Request for Comments on 'Review and Reassessment of the SSA's Representative Payee Selection and Replacement Policies'](#)," 83 Fed. Reg. 64422 (December 14, 2018), SSA-2018-0048," January 2019; Teaster, Wood, and Sands, "[Selection Processes for Social Security Administration Representative Payees of Adults](#)," SSAB, September 2020.

During a January 2020 roundtable on the claimant experience, subject matter experts, including a beneficiary, commented on challenges in the application process, the need for cognitive testing of application questions, and other changes to paper and online disability claim forms to improve user comprehension and functionality. Experts suggested that involving diverse users in evaluating programmatic changes provides an opportunity for SSA to address the diverse needs of its customers and assess equitable service.

In a September 2020 paper, Board-commissioned independent researchers studied SSA's process for selecting payees. Payees manage Social Security payments for beneficiaries who SSA determines cannot manage the funds themselves. The paper notes that SSA employees making such determinations face a difficult trade-off between "seeking to balance the harm to beneficiaries' self-determination in controlling their funds with the... harm from mismanagement or loss of funds without a payee."<sup>6</sup> The researchers identify variation in payee assignment and recommend specific improvements to achieve more consistent policy application. Past Board work urges SSA to regularize the collection and use of data to rigorously assess its payee selection process.<sup>7</sup>

Another area of Board focus has been the Supplemental Security Income program. The Board held a roundtable in November 2020, with experts and advocates.<sup>8</sup> While many changes to help underserved populations require legislation, former SSA Commissioner Jo Anne Barnhart explained that some changes that would help the underserved can be made through regulation.

The Board will continue its efforts to review and make recommendations to improve access to Social Security services by underserved populations. Should you have any further questions, please contact Claire Green, Staff Director, at [claire.green@ssab.gov](mailto:claire.green@ssab.gov).

Sincerely,



Bob Joondeph, on behalf of the Board

---

<sup>6</sup> Teaster, Wood, and Sands, "[Selection Processes for Social Security Administration Representative Payees of Adults](#)," SSAB, September 2020: 4.

<sup>7</sup> SSAB, "[Re: 83 Fed. Reg. 64422 \(December 14, 2018\), SSA-2018-0048](#)," January 2019.

<sup>8</sup> SSAB, "[Re-Examining Long-Standing Dedicated Account Challenges](#)," November 2020.